

BCOA-UMWA

Consensus Principles

(selected)

Respirable Dust Monitoring with
(or without) the PDM

BCOA-UMWA Consensus

- MSHA should do all compliance sampling.
- The PDM would be the sole means of monitoring exposure for compliance.
- Sampling information would be available to all interested parties

Consensus, cont'd

- Exploit PDM's two capabilities:
 - Improve dust control by identifying sources of excess exposure and
 - A means of determining non-compliance

Consensus, cont'd

- Samples should be taken
 - for a for full shift and
 - for work weeks longer than 40 hours, the EL would be adjusted by applying Haber's rule: $C \times T = K$, equivalent to 2.0 mg/m³ for 40 hours per week
- There would be no consideration of measurement error in determining non-compliance.

Miners' Concerns

- Data would be used in compensation hearings for black lung
- Somebody will find a way to cheat
- Data would be used against miners on the job if exposure was "too high":
 - Reassignment
 - Denial of overtime